

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

UNITED STATES OF AMERICA,

Plaintiffs,

v.

GERALD P. FOOX and
CAROL A. FOOX,

CASE NO.: 6:22-CV-00048

Defendants,

and

MERRILL LYNCH, PIERCE, FENNER,
& SMITH INCORPORATED,

Garnishee.

ANSWER OF GARNISHEE

The above-named Garnishee, Merrill Lynch, Pierce, Fenner & Smith Incorporated (“Garnishee”), for its answer to the Writ of Garnishment served herein upon it on or about March 8, 2022, regarding the indebtedness of Defendant Gerald P. Foon (“Defendant”), states as follows:

1. As of the time the Writ of Garnishment was served upon Garnishee, Garnishee’s records show a closed account ending in -9503 in the name of Gerald P. Foon with a zero balance.
2. Garnishee has no other tangible or intangible personal property of the Defendant Gerald P. Foon.
3. The foregoing represents the true status of any indebtedness due Defendant at the time of the service of the Writ herein.
4. Garnishee does not know of any other person who may be indebted to Defendant, or who may have any of the property of Defendant in its possession or control.

Dated: March 18, 2022

Respectfully Submitted,

McGUIREWOODS LLP

Respectfully submitted,

/s/ Addison Fontein

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LYNCH, PIERCE, FENNER & SMITH
INCORPORATED**

*Attorney for Garnishee Merrill Lynch, Pierce, Fenner &
Smith Incorporated*

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2022, I electronically filed the foregoing Answer of Garnishee with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Herb Linder, Esq.
United States Department of Justice
717 N. Harwood, Suite 400
Dallas, TX 75201
Herbert.W.Linder@usdoj.gov

/s/ Addison Fontein

Addison Fontein